

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF KENTUCKY
CENTRAL DIVISION AT LEXINGTON

Garey E. Lindsay, Regional Director of
the Ninth Region of the National Labor
Relations Board, for and on behalf of
the National Labor Relations Board

Petitioner,

vs.

Leggett & Platt, Inc.,

Respondent.

Civil Action No. 5:17-198-KKC

Judge Karen K. Caldwell

DECLARATION OF TINA FREEMAN

I, Tina Freeman, hereby depose and stated as follows:

1. I am making this declaration voluntarily. I understand that my position at Leggett & Platt, Inc. ("Company") is in no way affected by me making this declaration. I have not been promised anything of benefit by Company for making this declaration, and I have not been threatened by Company in any way in connection with this declaration. I was assured by Company that I was free to give this declaration or not, without promise of benefit, threat of reprisal or any other impact on my employment. I understand that this declaration concerns the circumstances surrounding the signing of a pro-union petition, and may be introduced into evidence in a case between the Company and the NLRB.

2. I work at the Company's Winchester plant (plant #002), and have been represented by the International Association of Machinists Union, Local 619 ("Union").

3. On December 7, 2016, I signed a petition stating, "The undersigned employees of Leggett and Platt #002 do not want to be represented by IAM 619 hereafter referred to as 'union.'" A true and correct copy of the petition I signed on December 7, 2016 is attached as Exhibit A.

4. On January 18, 2017, I attended a meeting called by the Union at the Union hall. At that meeting, I was told that if I wanted information regarding the Insurance, I should sign a piece of paper. Others were in line with me and heard the same statement. The paper I was told to sign had 20 lines on it for employee signatures. I do not believe that this paper contained a statement at the top stating,



"We the undersigned members of the International Association of Machinists and Aerospace Workers, Local Lodge 619, support the Union at Leggett & Platt, Inc." If this paper had contained such a statement, I would not have signed it because I did not support the Union on January 18, 2017, and I have not supported the Union at any time since I signed Exhibit A.

5. There was another table at the meeting as well. If called to testify in this matter, I would state that I heard union supporters at the other table telling people in line there that they needed to sign a document in order to get strike pay.

6. Attached as Exhibit B is a piece of paper that appears to bear my signature at line 5. I did not sign this document. I know this because I would not have signed a document stating that I supported the Union.

I declare under penalty of perjury that the foregoing is true and correct. This

Declaration was executed in the county of Clark, State of Kentucky, on this May day of 23 2017.

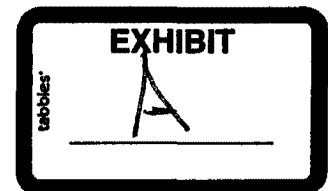

Tina Freeman

EMPLOYEE PETITION
FOR UNION DECERTIFICATION

KB

The undersigned employees of Leggett and Platt #002 do not want to be represented by IAM 619 hereafter referred to as "union"

	Name	signature	clock number	date	
1.	Tracy Burton	<i>Tracy Burton</i>	2106	12-6-16	✓
2.	James Hunter	<i>James Hunter</i>	2065	12-6-16	✓
3.	Christina Hunter	<i>Christina Hunter</i>	2046	12-6-16	✓
4.	Kelly Combs	<i>Kelly Combs</i>	2087	12-6-16	✓
5.	Doug Shepherd	<i>Doug Shepherd</i>		12-6-2016	✓
6.	Willie Wicks	<i>Willie Wicks</i>	794	12-6-2016	✓
7.	Lina Freeman	<i>Lina Freeman</i>		12-7-07EP	✓
8.					
9.					
10.					
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19.					
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22.					
23.					
24.					



We the undersigned members of the International Association of Machinists and Aerospace Workers, Local Lodge 619, support the Union at Leggett & Platt, Inc.

<u>Print Name</u>	<u>Sign Name</u>	<u>Date</u>
1) Christian T. McIntosh	Christian T. McIntosh	1-18-17
2) Tyler Troy	Tyler Troy	1-18-17
3) Zachary McQuinn	Zachary McQuinn	1-18-17
4) Ruben M. ELLIOTT	Ruben M. Elliott	1-18-17
5) Tina Freeman	Tina Freeman	1-18-17
6) Colman Cornt	Colman Cornt	1-18-17
7) PALE WISE	Pale Wise	1-18-17
8) Corey Hacker	Corey Hacker	1-18-17
9) Dustin Day	Dustin Day	1-18-17
10) George Davapont	George Davapont	1-18-17
11) Justin Gilvin	Justin Gilvin	1-18-17
12) Tyler Ratliff	Tyler Ratliff	1-18-17
13) Lowell Keeton	Lowell Keeton	1-18-17
14) Chris Carroll	Chris Carroll	1-18-17
15) Aaron Israel	Aaron Israel	1-18-17
16) John Crappale	John Crappale	1-18-17
17) Blake Griggs	Blake Griggs	1-18-17
18) Steven L. Utas	Steven L. Utas	1-18-17
19) Sam N. Diffey	Sam N. Diffey	1/18/17
20) Alan Kirby	Alan Kirby	1/18/17

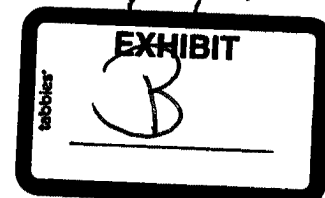


EXHIBIT I